

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

NATIONWIDE LIFE INSURANCE COMPANY,
a foreign corporation,

Plaintiff,

Case No. 2:11-cv-12422-AC-MKM

v.

Hon. Avern Cohn

WILLIAM KEENE, JENNIFER KEENE,
MONICA LYNN LUPILOFF, NICOLE RENEE
LUPILOFF and NICOLE RENEE LUPILOFF,
PERSONAL REPRESENTATIVE OF THE
ESTATE OF GARY LUPILOFF, DECEASED,

Defendants.

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**DEFENDANTS KEENE'S RE-MOTION TO ADJOURN
JULY 28, 2014 TRIAL DATE**

Now come Defendants, William and Jennifer Keene, by their attorneys BREDELL & BREDELL, and for their Motion to Adjourn the July 28, 2014 Trial, submits the following:

1. Trial is currently scheduled for July 28, 2014.
2. The facts submit previously by Defendants William and Jennifer Keene were incomplete and should have included the following:
 - a. Jennifer Keene's father, Dr. Laurence H. Baker, DO, scheduled, and purchased a trip to Disneyland departing July 26, 2014 and returning on August 2, 2014, in honor of his 50-year wedding anniversary (see Exhibit A attached).
 - b. Dr. Baker had arranged to take his entire extended family, including William and Jennifer Keene and their two minor children.
 - c. Dr. Baker purchased airline tickets, hotel accommodations, and make arrangements to take all of his children and grandchildren to Disneyland during this trip.
3. This trip has been planned, paid in advance, and non-refundable for several months and did not conflict with the trial date when scheduled.
4. Trial was previously adjourned at the request of the Plaintiff, and the new date is in conflict for the Defendants Keenes.
5. Dr. Baker and his wife will only get this one opportunity to celebrate their 50th Wedding anniversary as was previously planned and orchestrated.

6. An adjournment will not harm any of the parties to this litigation.
7. Defendants counsel's has contacted the opposing attorney and have been informed that this motion will not be contested.
8. Defendants Keene seek an adjournment of the Trial date previously set by this Court.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court adjourn the trial date as previously set by this Court.

Respectfully submitted,

Dated: May 21, 2014

/s/John H. Bredell (P36577)
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing pleading has been electronically filed with the Clerk of the Court on the below listed date via the Electronic Case Filing system, which will send notice of filing to all attorneys of record.

/s/Cynthia J. Joseph

DATED: May 21, 2014